

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,

Plaintiff

v.

C. A. No.: 1:19-CV-10203-IT

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,

Defendants.

AND

DAWN DORLAND PERRY

Plaintiff-in-Counterclaim

v.

SONYA LARSON

Defendant-in-Counterclaim

**DAWN DORLAND PERRY'S ASSENTED-TO MOTION TO ENLARGE
TIME TO RESPOND TO MOTION TO DISMISS COUNTERCLAIMS**

Comes now the Defendant and Plaintiff-in-Counterclaim, Dawn Dorland Perry ("Ms. Dorland") to respectfully request that this Court grant her permission to file her Opposition to Plaintiff/Defendant-in-Counterclaim Sonya Larson's ("Ms. Larson") Motion to Dismiss the Counterclaims filed in this matter on or before June 19, 2020, which is a three week extension to the current deadline of May 29, 2020. The other parties to this litigation assent to this request. As grounds for her request, Ms. Dorland states as follows:

1. Ms. Larson timely filed her Motion to Dismiss the Counterclaims on May 15, 2020.
2. Ms. Dorland's undersigned counsel has a previously-scheduled arbitration, scheduled

to begin in JAMS on June 9, 2020, with several pre-hearing deadlines beginning on May 26, 2020. In addition, undersigned counsel has a brief due in the Massachusetts Appeals Court on June 12, 2020, in a matter that proceeded through to trial. Finally, in addition to these conflicting scheduling issues on the professional front, undersigned counsel has had personal conflicts in the form of a child's graduation from college (albeit somewhat altered, given the COVID-19 pandemic) and related events and celebrations.

3. Ms. Dorland's counsel conferred with Ms. Larson's counsel concerning these conflicts during the parties' conference pursuant to Local Rule 7.1, prior to the filing of the Motion to Dismiss, and Ms. Larson's counsel indicated his willingness to assent to an extension at that time.
4. As a result of the advance conference and the assent to this motion, there is no prejudice to any party as a result of this extension.

WHEREFORE, Ms. Dorland respectfully requests that the deadline for her Opposition to Ms. Larson's Motion to Dismiss the Counterclaim be extended to June 19, 2020 in order to accommodate her counsel's schedule.

Respectfully submitted,

DAWN DORLAND PERRY

By Her Attorneys,

PARTRIDGE SNOW & HAHN LLP

/s/ Suzanne Elovecky

Suzanne Elovecky (BBO #670047)

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DATED: May 27, 2020

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants, if any, on May 27, 2020.

/s/ Suzanne M. Elovecky

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